

EPA Region 5 Records Ctr.



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RZ2.R05052.01.ID.211

July 17, 1998

Mr. Gerald Phillips  
U.S. Environmental Protection Agency  
Region 5 D-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052  
Environmental Priorities Initiative (EPI) Assessments; Certified Technology,  
Inc., Rockford, Illinois, EPA ID No. ILR000016980; PA/VSI Report and  
NCAPS Scoring Report; Task 04 Deliverable

Dear Mr. Phillips:

Please find the enclosed Preliminary Assessment/Visual Site Inspection (PA/VSI) Report  
and the NCAPS Scoring Report for the above-referenced facility. The NCAPS total  
migration score is 8.14.

Should you have any questions or require additional information, please feel free to contact  
me at (312) 345-8963 or Mr. Bill Wesley at (312) 345-8955.

Sincerely,

*Patricia Brown-Derocher*  
Patricia Brown-Derocher  
Regional Manager

Enclosures

cc: F. Norling, EPA Region 5, w/o attachments  
W. Jordan/Central Files  
B. Wesley  
Chicago Central Files

c:\ehs\52\52id211.wpd



**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION  
FOR  
CERTIFIED TECHNOLOGY, INC.  
EPA ID No. ILR000016980  
915 22nd STREET  
ROCKFORD, ILLINOIS**

**Submitted to:**

**Mr. Gerald Phillips  
U.S. Environmental Protection Agency  
Region 5 D-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604**

**Submitted by:**

**TechLaw, Inc.  
20 North Wacker Drive, Suite 1260  
Chicago, Illinois 60606**

**EPA Work Assignment No.  
Contract No.  
TechLaw WAM  
Telephone No.  
EPA WAM  
Telephone No.**

**R05052  
68-W4-0006  
Mr. Bill Wesley  
312/345-8955  
Mr. Gerald Phillips  
312/886-0977**

**JULY 17, 1998**

**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT  
FOR  
CERTIFIED TECHNOLOGY, INC.  
EPA ID No. ILR000016980  
915 22nd STREET  
ROCKFORD, ILLINOIS**

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## I. EXECUTIVE SUMMARY

The RCRA Facility Assessment (RFA) is the first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The purpose of the RFA is to identify environmental releases or potential releases from solid waste management units (SWMUs) and areas of concern (AOCs) that may require corrective action by the facility owner. A preliminary assessment/visual site inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at the Certified Technology, Inc. (Certified Technology) facility in Rockford, Illinois.

A preliminary assessment (PA) of the available U.S. Environmental Protection Agency (U.S. EPA) and State of Illinois file materials was conducted to familiarize the TechLaw, Inc. (TechLaw) Team with past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes and waste management practices at the Certified Technology facility.

A Visual Site Inspection (VSI) was conducted at the facility on June 3, 1998 by the TechLaw Team to identify and characterize SWMUs and AOCs. Mr. Edward Eggleston, the President of Certified Technology provided facility history, process and waste management information during the VSI. Mr. Eggleston also provided additional file material after the VSI had been completed. Mr. Duane Herrmann of Certified Technology and environmental consultant, Ken R. Thompson of Fehr-Graham Associates, were also present for the duration of the VSI. The photographs taken during the VSI are documented in Appendix A. The VSI Field Notebooks are included in Appendix B, and a Site Map showing SWMU and AOC locations is presented in Appendix C.

A total of four SWMUs were identified. No AOCs were identified. The SWMUs are described in more detail in Section III of this report. Based on available file materials and VSI observations, all the SWMUs appeared to have a low potential for environmental release.

Illinois EPA (IEPA) required closure of the Former Hazardous Waste Storage Area (SWMU 1) when it determined during a 1996 compliance inspection that Certified Technology had been generating hazardous wastes for approximately 10 years without having shipped any hazardous waste off-site. Accordingly, IEPA classified the facility as a reduced requirement - small quantity generator (SQG) which had stored hazardous waste on-site for over 180 days and was therefore considered a hazardous waste storage facility without a RCRA permit. At the time of the inspection, Certified Technology had accumulated approximately ninety 55-gallon drums of plating process wastes on site. SWMU 1 went through RCRA closure in the spring of 1997 according to the IEPA approved closure workplan and IEPA approved the final closure on May 7, 1997.

Upon closure of the Former Hazardous Waste Storage Area (SWMU 1), Certified Technology began using the area as a temporary staging area for containerized waste acids used in plating, cleaning and stripping of parts. These wastes are the same wastes which were managed at this unit prior to closure, and they typically carry hazardous waste codes which include D002, D007, D008, and D010. These containerized wastes are moved to the Hazardous/Non-Hazardous Waste Storage Area (SWMU 2) prior to being transported off-site for treatment and/or disposal by Clean Harbors, Laidlaw and Phibro-Tech.

## II. SITE DESCRIPTION

Mr. Ed Eggleston owns and operates the nickel plating business which is known as Certified Technology, Inc. (Certified Technology). The Certified Technology facility is located at 915 22nd Street in Rockford, Illinois and is situated in an industrial and residential area. Certified Technology leases the southern two sections (A and B) of a four section building owned by B & J Building. Section C and D are north of Certified Technology. Section C, immediately north of Certified Technology is occupied by a glass/window company (Ability Glass) while section D (north of section C) is occupied by a tool and die shop. The facility is bounded to the east by 22nd Street, to the west by an alley and residences, and to the south by a private residence. The facility property covers one acre. Administrative and industrial operations occur in one building which contains an office area, laboratory, and two large rooms used for primarily for plating and materials and waste storage. The entire facility has a total floor space of approximately 9,000 square feet. Appendix C presents a facility's map, as well as the locations of all the SWMUs identified during the VSI.

Certified Technology began business at the site in 1984. The nickel plating process and associated waste storage have been conducted in the southern half of the facility since 1984. The northern half of the facility has been leased by Certified Technology since 1997, and a portion of the northern room has been used by Mr. Ed Eggleston and his car club since May 1997 to store vintage British cars. Certified Technology uses the remainder of the northern portion of the facility to store raw materials and containerized hazardous and non-hazardous waste. The facility laboratory is located in the southern half of the building. The laboratory is used to test nickel plating solutions and small amounts of waste nickel plating solutions are generated in the laboratory each year. Certified Technology representatives speculated that the building was built in the 1930s or 1940s. Certified Technology had no knowledge of who may have occupied the building prior to 1984.

Certified Technology currently employs three people. Certified Technology performs electric-less nickel plating of various metal parts, primarily for the food and printing industry. Electric-less nickel plating is the only electroplating process which has been conducted by Certified Technology at this site. Raw materials used in the facility operations include the following: muriatic acid, phosphoric acid, nitric acid, and nickel plating solutions.

There are several waste streams generated at the facility. Non-hazardous, municipal solid waste and industrial waste such as paper, wood, plastic containers and cardboard are generated and managed in dumpsters prior to being transported off-site for disposal. Waste oils are generated by the car club, however, car club members are reportedly responsible for taking the waste oil off-site and disposing of it properly. With the exception of a pie-tin containing waste oil, no waste oil was observed at the site.

Acid stripping and plating wastes containing heavy metals such as chromium, lead, nickel, selenium, and zinc are generated in the plating area from the preparation of parts for plating and

the actual plating process, including the first and second rinses following plating. Waste nitric acid from the passivating operation and waste muriatic acid from the pickling operation typically carry D002 (corrosivity) and D007 (chromium), D008 (lead) and D010 (selenium) hazardous waste codes. Additionally, Certified Technology generates a non-hazardous waste sodium orthophosphite sludge containing nickel from the plating operations and a non-hazardous waste alkaline parts cleaner. All of the above wastes are containerized in 55-gallon drums and stored on-site in the Hazardous/Non-Hazardous Waste Storage Area (SWMU 2) prior to off-site treatment and disposal. Additionally, nickel-plating bath samples analyzed in the laboratory are containerized in existing 55-gallon drums prior to disposal. No other waste is generated in the laboratory according to facility representatives.

The facility has a General Wastewater Discharge Permit from the Rock River Water Reclamation District which enables them to discharge rinsewater generated from parts cleaning to the local sanitary sewer system. Rinsewater is pumped via sump-pumps from the Rinsewater Sumps (SWMU 3) to overhead pipes and eventually into a sewer drain (Wastewater Piping and Sewer Drain - SWMU 4) which drains directly to the city sanitary sewer underlying 22nd Street. No pre-treatment of the rinsewater occurs at the facility prior to discharge into the sewer system. Pollutants monitored in the wastewater include cadmium, cyanide, chromium, copper, lead, molybdenum, nickel, silver, toxic organics, and zinc. Available analytical reporting data indicate that Certified Technology was within its General Wastewater Discharge Permit concentrations for 1997, and the Rock River Water Reclamation District confirmed that they have never taken an enforcement action against the facility or identified the facility as a significant non-complier.

### Release History

The only evidence of a potential release involved the Former Hazardous Waste Storage Area (SWMU 1). The closure report for the unit indicates that some staining was observed immediately adjacent to a wall in a two feet by 24 feet area. This area was cleaned with trisodium phosphate soap and triple rinsed during RCRA closure activities. Based on a concrete inspection during closure, contractors for Certified Technology determined that soil sampling was not necessary. IEPA inspected the Former Hazardous Waste Storage Area (SWMU 1) April 17, 1997 and determined that the unit had been closed in accordance with the approved closure plan.

### Environmental Setting

The Certified Technology facility is located in an industrial/residential area in Rockford, Illinois. Private industrial companies are housed in the same building, to the north of Certified Technology. A private residence is located to the south of Certified Technology and the site is bounded to the east by 22nd Street and to the west by an alley, 21st Street and private residences. The Rock River is located approximately two miles to the east of the facility, and Keith Creek is located approximately 300 feet north of Certified Technology. The nearest residential unit is located approximately 100 feet south of the facility. No sensitive environments or wetlands were

observed in the vicinity of the facility during the VSI or upon analysis of the area's United States Geological Survey (USGS) topographic map coverage.

Information from databases maintained by the Illinois State Water Survey reveals that there are several groundwater wells within a 3/4 mile radius of the facility, many of which appear to be in use. Based on available information, the nearest groundwater drinking well is believed to be located within 0.3 miles of the facility.

Based upon a review of a USGS topographic map, it appears that the area around the facility gently slopes to the east towards the Rock River. The area around the facility has a 1-year, 24-hour maximum rainfall average of about 2.5 inches and a net precipitation of approximately 2.0 inches.

According to the 1984 Illinois Department of Energy and Natural Resources: State Geological Survey Division publication, *Geology for Planning in Boone and Winnebago Counties* (Berg, R.C. Kemp., Kempton, J.P. and Stecyk), unconsolidated glacial sediments fill the Rock River valley up to a depth of 250 feet and consist of alternating layers of sand/gravel and lacustrine, silt, and clay. The shallow aquifer is located in this unconfined, unconsolidated sand and gravel. The deep aquifer is the confined Mt. Simon sandstone which extends approximately 1,500 feet.

#### Regulatory History

On October 22, 1992, IEPA performed a RCRA compliance evaluation inspection (CEI). According to the inspection report, IEPA was investigating a complaint that Certified Technology was storing 50-100 drums of waste at the facility. The inspection report concluded that the drums actually contained "fresh nickel plating solution or acid." No violations were cited as a result of the inspection.

On February 12, 1996, an inspection by the Rock River Water Reclamation District (RRWRD) revealed that approximately 60 drums of suspected waste nickel plating solution were present at the site.

A February 15, 1996, RCRIS entry identifies the facility as a small quantity generator and storage facility without a permit.

The RRWRD notified the IEPA Division of Land Pollution Control of their February 12, 1996 observations and a follow-up RCRA CEI was conducted on March 8, 1996. During the March 8, 1996 inspection, IEPA determined that the facility had been generating RCRA hazardous waste for 10 years without shipping any of it off-site. Ninety drums of plating and parts-cleaning waste, including 76 which carried a D002 hazardous waste code, were reportedly in storage at the facility. IEPA therefore determined that Certified Technology would be tracked as a RCRA hazardous waste generator and storage facility requiring a permit. IEPA also cited 20 violations of RCRA generator and storage facility requirements, including a failure to label drums as

**hazardous waste and a failure to obtain a RCRA permit for the storage of hazardous waste.**

**On April 29, 1996, IEPA sent a Pre-Enforcement Conference Letter to Mr. Eggleston of Certified Technology. The letter requested that Mr. Eggleston attend an enforcement conference on May 14, 1996 to discuss the violations cited as a result of the March 8, 1996 inspection.**

**On June 5, 1996, another CEI was conducted by IEPA as a follow-up to the March 8, 1996 inspection. The CEI report indicated that the facility had shipped all of the hazardous waste and most of the non-hazardous waste off-site (with the exception of 15 drums of non-hazardous waste) and had agreed to go through RCRA closure of the Former Hazardous Waste Storage Area (SWMU 1). The report cited 15 outstanding RCRA violations stemming from a failure to comply with RCRA hazardous waste storage requirements.**

**A Notice of Closure for the Former Hazardous Waste Storage Area (SWMU 1) was posted in the Rockford Register Star on Wednesday, July 17, 1996.**

**On August 23, 1996, the IEPA wrote to Certified Technology regarding a RCRA closure plan submitted August 12, 1996 for the Former Hazardous Waste Storage Area (SWMU 1). The plan was conditionally approved by IEPA in the letter. Additionally, a separate letter was sent by IEPA to Certified Technology on this date, informing them that as a result of a July 10, 1996 response (not in the available file materials) to the April 29, 1996 Pre-Enforcement Conference Letter, the facility had returned to compliance for two apparent violations related to financial assurance for RCRA closure.**

**In March of 1997, Certified Technology submitted a certification of closure and a closure documentation report to IEPA for the Former Hazardous Waste Storage Area (SWMU 1).**

**On April 17, 1997, IEPA conducted a RCRA closure verification inspection (CVI) to document the results of closure activities conducted in November, 1996. On May 7, 1997, IEPA sent a letter to Certified Technology informing them that the April 17, 1997 CVI determined that the facility appeared to have closed the area in accordance with the approved closure plan, and therefore no further action was required of Certified Technology at that time.**

**Certified Technology has an active General Wastewater Discharge Permit from the RRWRD which enables them to discharge rinsewater generated from parts cleaning to the local sewer system. The current permit was issued January 27, 1997, and expires on January 31, 2000. According to Dennis Priewe of the RRWRD, permits are renewed every three to five years and the facility has likely had a wastewater discharge permit since it began operations at the site in 1984. Mr. Priewe said that it is his understanding that no enforcement actions have been taken against the facility by the RRWRD and they have never identified the facility as a significant non-complier.**

**No record of air permits or inspections was found in the available file material nor obtained during the VSI.**

### III. SOLID WASTE MANAGEMENT UNITS

A total of four solid waste management units (SWMUs) and no areas of concern (AOCs) were identified during the PA and VSI. The SWMUs and AOCs are listed in Table III-1 on the following page.

This section presents descriptions of the SWMUs identified during the PA and VSI at the Certified Technology, Inc. facility. Photograph numbers correspond to those presented in the Photograph Log in Appendix A. A map showing SWMU and AOC locations is presented in Appendix C.

**TABLE III-1**

**SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN SUMMARY  
CERTIFIED TECHNOLOGY, INC.**

<b>SWMU No.</b>	<b>SWMU NAME</b>	<b>RELEASE POTENTIAL</b>
<b>SWMU 1</b>	<b>Former Hazardous Waste Storage Area</b>	<b>Low</b>
<b>SWMU 2</b>	<b>Hazardous/Non-Hazardous Waste Storage Area</b>	<b>Low</b>
<b>SWMU 3</b>	<b>Rinsewater Sumps</b>	<b>Low</b>
<b>SWMU 4</b>	<b>Wastewater Piping and Sewer Drain</b>	<b>Low</b>

## **SWMU 1 - Former Hazardous Waste Storage Area**

**Report Photo No(s):** 1 and 2

**Log Book Photo No(s):** 1-1 and 1-2

**Period of Operation:** 1984 to Present

**Location:** This unit is located indoors in the northwest corner of the plating room (Section A).

**Physical Description:** This unit consists of an approximately 15 foot by 25 foot area of concrete floor which is free of cracks or other indications of integrity problems. During the VSI, some water was observed in the vicinity of the unit, however, no evidence of release was observed from the four 55-gallon plastic drums stored at the unit. Prior to May 1997, this area was used for the storage of various containerized hazardous wastes. During a March 8, 1996 RCRA CEI, IEPA determined that the facility had been generating RCRA hazardous waste for 10 years without shipping any of it off-site. The unit was RCRA closed and a no further action letter was sent to the facility on May 7, 1997. The area is currently used for the accumulation of D002, D007, D008, and D010 hazardous wastes and may also be used for the accumulation of non-hazardous wastes. Following the accumulation of a full drum, the waste is transferred to the Hazardous/Non-Hazardous Waste Storage Area (SWMU 2) prior to off-site disposal/treatment. No secondary containment devices were identified in association with this unit.

**Wastes Managed:** The unit managed various containerized hazardous wastes, including waste nitric acid (D002, D008, D010), waste sodium hydroxide (D002), and waste hydrochloric acid (D002, D007, D008, and D010). As indicated by the D007 (chromium), D008 (lead) and D010 (selenium) hazardous waste codes, the acid wastes sometimes contained heavy metals at hazardous concentrations. Additionally, records indicate that some hydrochloric and nitric acid waste only carried a D002 waste code. When Certified Technology performed RCRA closure activities in 1996, all of the drummed waste residing at the unit was shipped off-site for disposal. This included 71 drums of D002 nitric acid waste, seven drums of D002 sodium hydroxide waste, three drums of D002 hydrochloric acid waste, 12 drums of D002 nitric acid waste, one drum of D002, D008, D010 nitric acid waste, and two drums of D002, D007, D008, D010 hydrochloric acid waste. At the time of the VSI there were five drums of D002 acid waste, two of which were used in stripping operations and also carried D007, D008, and D010 hazardous waste codes.

**History of Releases:** The closure report indicates that some staining was observed immediately adjacent to a wall in a two foot by 24 foot area. This area was cleaned with trisodium phosphate soap and triple rinsed during closure activities. Based on a concrete inspection during closure, contractors for Certified Technology determined that soil sampling was not necessary. IEPA inspected the unit on April 17, 1997 and determined that the unit had been closed in accordance with the approved closure plan.

**Potential for Past/present Release:**

**High ( )**  
**Moderate ( )**  
**Low (X)**

**Conclusions:** Based on a concrete inspection during closure, IEPA's determination the unit had been closed in accordance with the approved closure plan, and observations made during the VSI, it does not appear that this unit has released to the environment. Therefore, no further action is recommended for this unit.

## **SWMU 2 - Hazardous/Non-Hazardous Waste Storage Area**

**Report Photo No(s):** 3, 4, and 5

**Log Book Photo No(s):** 1-3, 1-4, and 1-5

**Period of Operation:** May 1997 to Present

**Location:** This unit is located in the northern half of the facility (Section B), in the southwest corner.

**Physical Description:** This unit is a less than 90-day storage area which is situated on the crack free concrete floor of the facility building and occupies a total area of approximately 40 feet by 20 feet. The hazardous waste portion occupies an area measuring approximately 15 feet by 20 feet. The remaining area is used for the storage of non-hazardous wastes. At the time of the VSI, 13, 55-gallon drums of hazardous waste and approximately 100 drums of non-hazardous waste were present. Small quantities of product were also observed in this area, stored in 5-gallon and smaller containers. No secondary containment devices were identified in association with this unit at the time of the VSI.

**Wastes Managed:** This unit receives wastes from the Former Hazardous Waste Storage Area (SWMU 1) which is currently used as a waste accumulation area. Of the approximately 113, 55-gallon drums of waste present, 13 drums were D002, D007, D008, and D010 hazardous wastes, 75 were non-hazardous waste nickel plating solutions, and 25 were various non-hazardous wastes which included floor sweepings and wastewater. Wastes are transported off-site for treatment and/or disposal by Clean Harbors, LaidLaw and Phibro-Tech.

**History of Releases:** None observed at the time of the VSI or reported in the file materials.

**Potential for Past/present Release:**

<b>High</b>	<b>( )</b>
<b>Moderate</b>	<b>( )</b>
<b>Low</b>	<b>( X )</b>

**Conclusions:** No further action is recommended since the unit is located indoors on sealed concrete and there is no evidence of releases.

### **SWMU 3 - Rinsewater Sumps**

**Report Photo No(s):** None

**Log Book Photo No(s):** None

**Period of Operation:** 1984 to Present.

**Location:** These sumps (three in total) are located between plating lines one and two, plating lines two and three, and north of plating line four, respectively.

**Physical Description:** Each of the three Rinsewater Sumps is a sawed-off 55-gallon plastic drum containing a sump-pump which pumps wastewater to the overhead wastewater pipes (Wastewater Piping and Sewer Drain - SWMU 4). These units are above-ground, resting on the concrete floor surface in the southern portion of the facility which contains the plating lines. Each sump receives non-hazardous rinsewater generated during pre-plating and post plating operations. No secondary containment devices were identified in association with this unit during the VSI.

**Wastes Managed:** This unit manages rinsewaters generated during the pre-plating and post-plating of parts. This wastewater is non-hazardous, however, it does contain some hazardous constituents. Pollutants detected in the wastewater include copper, cadmium, nickel, chromium, copper, lead, nickel, and zinc. None of these pollutants are present at concentrations which require treatment prior to discharge to the sanitary sewer.

**History of Releases:** None observed at the time of the VSI or reported in the file materials.

<b>Potential for Past/present Release:</b>	<b>High</b> ( )
	<b>Moderate</b> ( )
	<b>Low</b> ( X )

**Conclusions:** No further action is recommended since the units are located indoors above sealed concrete floors, and there is no history of release from these units.

#### **SWMU 4 - Wastewater Piping and Sewer Drain**

**Report Photo No(s):** None

**Log Book Photo No(s):** None

**Period of Operation:** 1984 to Present

**Location:** This unit consists of overhead piping leading from the Rinsewater Sumps (SWMU 3) to the sewer drain in the extreme northeastern corner of the plating room (Section A).

**Physical Description:** This unit consists of a combined 200 feet of 1-½ to 1-¾ inch overhead PVC piping which carries wastewater from the Rinsewater Sumps (SWMU 3) to the in-ground sewer drain in the extreme northeastern corner of the facility. The sewer drain connects directly to the City of Rockford sanitary sewer underlying 22nd Street immediately east of the facility.

**Wastes Managed:** This unit manages rinsewaters generated during the pre-plating and post-plating of parts. This wastewater is non-hazardous however it does contain some hazardous constituents. Pollutants that have been detected in the wastewater include copper, cadmium, nickel, chromium, copper, lead, nickel, and zinc. None of these pollutants are present at concentrations which require treatment prior to discharge to the sanitary sewer.

**History of Releases:** There is no record of releases from this unit. According to a representative of the Rock River Water Reclamation District, wastewater discharges from this unit have been in significant compliance with discharge limitations established in the General Wastewater Discharge Permit issued by the Rock River Reclamation District.

**Potential for Past/present Release:**

<b>High</b>	<b>( )</b>
<b>Moderate</b>	<b>( )</b>
<b>Low</b>	<b>( X )</b>

**Conclusions:** As there is no record of releases from this unit, no further action is recommended for this unit.

#### IV. AREAS OF CONCERN

No Areas of Concern (AOCs) were identified during the PA/ VSI at the Certified Technology facility.

## V. CONCLUSIONS

As the only area observed or documented to have potentially been contaminated was an indoor unit which has since undergone an IEPA approved RCRA closure, further investigations under Corrective Action Authorities do not appear to be warranted.

## VI. REFERENCES

1. Illinois Environmental Protection Agency, Division of Land Pollution Control, RCRA Inspection Report for inspection of Certified Technology, Inc., Rockford Plant, dated October 22, 1992.
2. Illinois Environmental Protection Agency, Division of Land Pollution Control, Complaint Investigation Form for Certified Technology, Inc., Rockford Plant, dated February 16, 1996.
3. Illinois Environmental Protection Agency, Division of Land Pollution Control, RCRA Inspection Report for inspection of Certified Technology, Inc., Rockford Plant, dated March 8, 1996.
4. Illinois Environmental Protection Agency, Division of Land Pollution Control, letter to Certified Technology regarding violations based on March 8, 1996 Inspection, dated April 29, 1996.
5. Certified Technology, Inc., Waste Handling and Emergency Procedures, dated May 15, 1996.
6. Illinois Environmental Protection Agency, Bureau of Land/Field Operations Section, RCRA Inspection Report for inspection of Certified Technology, Inc., Rockford Plant, dated June 5, 1996.
7. Rockford Register Star, Notice of Closure No. C-768 for plan to close the hazardous waste container storage area located at Certified Technology, dated July 17, 1996.
8. Illinois Environmental Protection Agency, Permit Section, letter to Certified Technology, Inc., regarding review of closure plan, dated August 23, 1996.
9. Illinois Environmental Protection Agency, Bureau of Land, letter to Certified Technology regarding compliance for apparent violations, dated August 23, 1996.
10. Rock River Water Reclamation District, letter to Certified Technology Inc., regarding General Wastewater Discharge Permit, dated January 30, 1997.
11. Certified Technology Inc., Certification of Closure and Closure Documentation Report, dated March 1997.
12. Illinois Environmental Protection Agency, Bureau of Land/Field Operations Section, RCRA Inspection Report, for inspection of Certified Technology, Inc., Rockford Plant, dated April 17, 1997.

13. Illinois Environmental Protection Agency, Bureau of Land, Permit Section, letter to Certified Technology Inc., regarding Inspection of April 17, 1997, dated May 7, 1997.
14. TechLaw, Inc., Field Inspection Checklist by Mike Powers, dated June 3, 1998.
15. TechLaw, Inc., Field Inspection Checklist by Bill Wesley, dated June 3, 1998.
16. Telephone call from Dennis Priewe, Rock River Water Reclamation District to Bill Wesley, dates July 8, 1998.
17. Material Safety Data Sheet, sodium aryl sulfonate, September 5, 1990 revision, received during June 3, 1998 VSI.
18. Illinois State Waste Survey, Private Well and PICS groundwater information, dated July 13, 1998.

**APPENDIX A**  
**Visual Site Inspection Photograph Log**



Report Photograph No.: 2

Report Photograph No.: 1

Logbook Photograph No.: 1-1

Date: 6/3/98

Time: 1145

Time: 1140

Direction: North

Description: View of the Former Hazardous Waste Storage Area (SWMU 1). The 55-gallon drums are used for accumulating hazardous wastes while the smaller containers in the background are used for product storage.

A-2

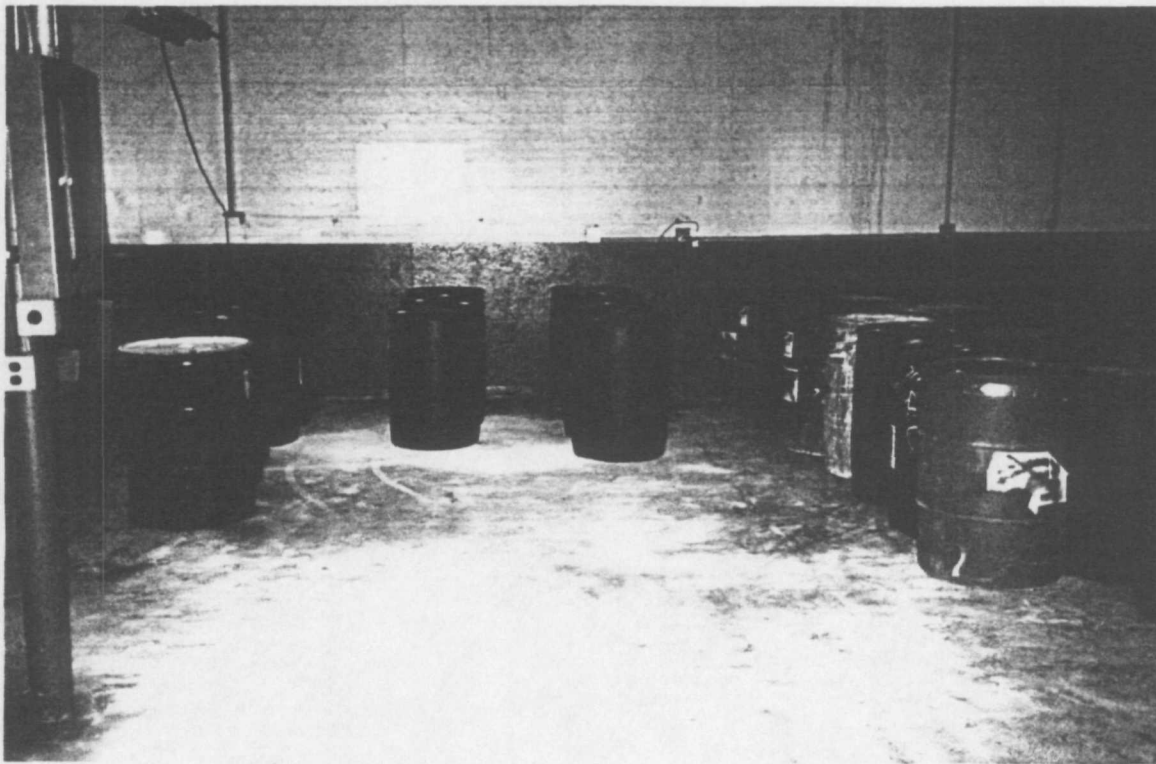
A-1



Report Photograph No.: 2  
Logbook Photograph No.: 1-2  
Date: 6/3/98

Time: 1145  
Direction: West

Description: Another view of the Former Hazardous Waste Storage Area (SWMU 1). Product is stored in the 5-gallon plastic containers seen to the right. The 55-gallon drums are used for the accumulation of hazardous wastes.



Report Photograph No.: 3  
Logbook Photograph No.: 1-3  
Date: 6/3/98

Time: 1151  
Direction: South

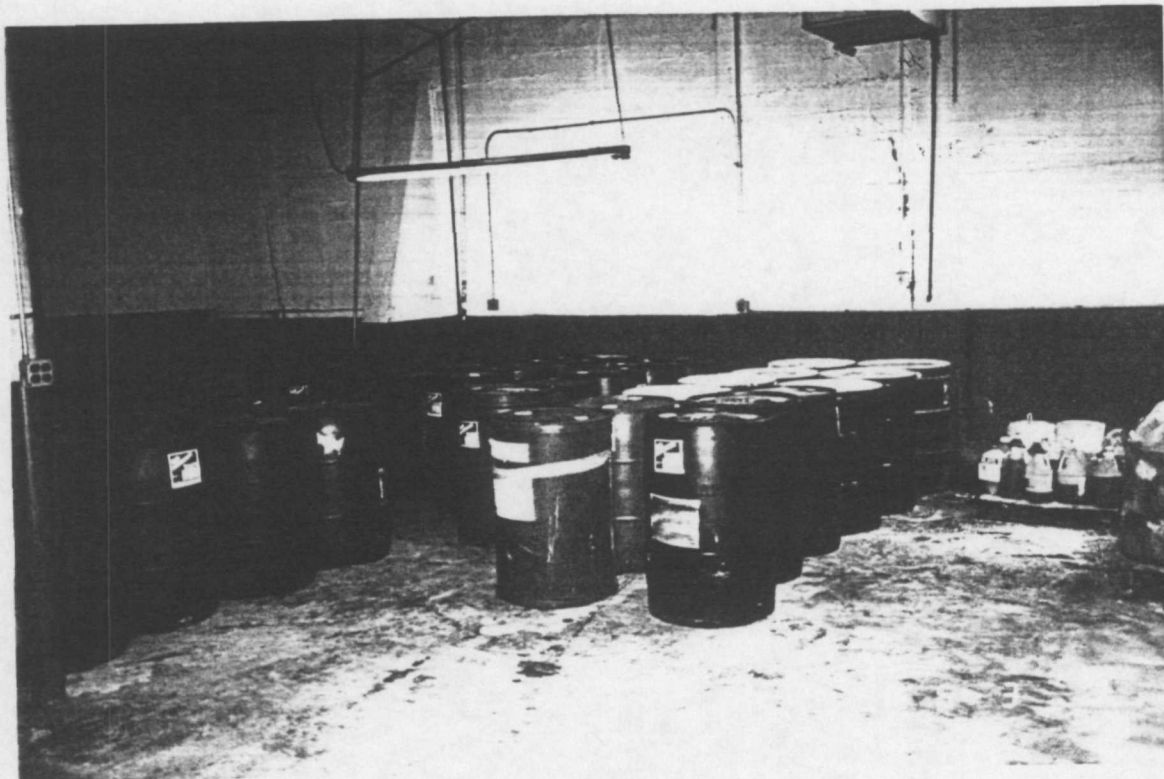
Description: View of the Hazardous/Non-Hazardous Waste Storage Area (SWMU 2). At the time of the VSI, hazardous waste was stored in the 13 drums located in the left half of the photo.



Report Photograph No.: 4  
Logbook Photograph No.: 1-4  
Date: 6/3/98

Time: 1152  
Direction: Southwest

Description: Another view of the Hazardous/Non-Hazardous Waste Storage Area (SWMU 2), focusing on the non-hazardous waste portion. Approximately 100 drums of non-hazardous waste were present in total, approximately 75 drums were nickel wastes and 25 were miscellaneous wastes.



Report Photograph No.: 5  
Logbook Photograph No.: 1-5  
Date: 6/3/98

Time: 1204  
Direction: West/Southwest

Description: Another view of the Hazardous/Non-Hazardous Waste Storage Area (SWMU 2). The wastes are primarily non-hazardous floor sweepings to the left and non-hazardous plating sludge to the right. The 1-gallon containers to the right were reportedly product.

**APPENDIX B**  
**VISUAL SITE INSPECTION FIELD NOTEBOOK**

## Introductory Meeting

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page: 1 of 17

### Personnel Present

Time 9:50

#### 1.) VSI Team

Bill Wesley  
Mike Power

#### 2.) Facility Representatives

Ed Eggleston  
Ken Thompson  
Diane Herrman

Ken R. Thompson  
Project Manager - Environmental

815/235-7643  
815/394-4700 (Rockford)  
FAX 815/235-4632

660 W. Stephenson Street  
Freeport, Illinois 61032



FEHR-GRAHAM  
& ASSOCIATES  
Engineering and Science  
Consultants

#### 3.) State Representative

Not in attendance

### Topics Addressed

#### 1.) Purpose of VSI

☒ Bill discussed, not due to closure, not compliance

#### 2.) List of SWMUs/AOCs

☒ Cur. Sat Accum (aka Former Haz Area), Cur Haz <sup>②</sup> <sup>③</sup> ~~Haz~~ Storage

#### 3.) Health and Safety

☒ no PPE required

#### 4.) Transportation on Site

☒ walking tour

#### 5.) Other

☐

Notes: Fehr-Graham working w/ Certified for several years

9000 sq ft, 3 employees

→ car club activities - all waste taken home by individuals, none stored

→ initial walk-through 10:05 - 10:30

→ car club present since October '97, that portion of property leased starting May '97

Signature: MP

## Current/Former Operations

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 2 of 12

Time \_\_\_\_\_

- 1.) Current Owner B+J Building <sup>Corporation</sup> ~~Management~~ MP  
Current Operator Certified Technology - Ed Englesten  
Dates of Current Operations 1984 to Present  
Operations Electricless Nickel Plating - food processing eqpt, knitting machines, machine parts, 80% steel, balance brass, alum
- 2.) Former Owner Ed Englesten believes  
Former Operator K + ?  
Dates of Former Operations Pre 1984 (building vacant when Certified leased in '84)  
Operations Steel/washer tanks manufacture - likely
- 3.) Former Owner \_\_\_\_\_  
Former Operator \_\_\_\_\_  
Dates of Former Operations \_\_\_\_\_  
Operations \_\_\_\_\_

Notes: Car Club area leased beginning in May '97, no wastes stored in car club portion  
→ adjacent machine shop (to north) - occupied for 7-8 yrs, ~3 different companies  
→ Window and Door Shop - occupied adjacent area (machine shop), ~3 yrs prior to machine shop, came in to operation ~ '85 - '86  
Constructed in 1940s Signature: MP

# Hazardous Waste Processes

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 3 of 17

Time 10:40

<u>Current/Former</u>	
Waste(s) Generated	all also inc. 0002 0002, 0008, 0010, 0007 muriatic, nitric, phosphoric
Rate	stripper - ethylene diamine solution
Disposition	* see Bills notes for more info L contains benz/toxic CAS 107-15-3 ① ethylene diamine 1310-73-2 ② sodium hydroxide
Dates	
<u>Current/Former</u>	reportedly same process since 1984
Waste(s) Generated	Al, Zn, Ni rust removal
Rate	55-gal drums 8-10 nitric, 2-3 min, 3 phos, stripper 6,
Disposition	4 cleaner
Dates	
<u>Current/Former</u>	nickel plating bath waste & 99% of solution in bath
Waste(s) Generated	nickel sulphate and phosphorus, sodium orthophosphate sludge (non haz) 55-gal plastic
Rate	3-5 drums of sludge (non haz) present
Disposition	
Dates	'84 to Present

Notes:

Signature: MP

TechLaw, Inc.

## Hazardous Waste Processes

Facility: **Certified Technology, Inc.**

City/State: **Rockford, Illinois**

Date: **6/3/98**

Page **4** of **17**

	Time _____
___ Current/Former	
Waste(s) Generated	
Rate	
Disposition	
Dates	
___ Current/Former	
Waste(s) Generated	
Rate	
Disposition	
Dates	
___ Current/Former	
Waste(s) Generated	
Rate	
Disposition	
Dates	

Notes: \_\_\_\_\_

Signature: *mf*

**Active/Closed USTs**

Facility: **Certified Technology, Inc.**

City/State: **Rockford, Illinois**

Date: **6/3/98**

Page **5** of **17**

	Time
Product	
Capacity	
Construction	
Installed (yr)	
Closed/Date	
Product	
Capacity	
Construction	
Installed (yr)	
Closed/Date	
Product	
Capacity	
Construction	
Installed (yr)	
Closed/Date	

*No USTs reported present*

Notes: \_\_\_\_\_

Signature: *MB*

SWMU No. 1

Name Former Haz Waste Storage Area  
& Current Haz Waste Accumulation Area

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 6 of 12

Time 11:35 AM

☒ Active/Former/Closed

Former Site Area closed by state in '97, Accum. Area Independent

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

Former Storage, currently accumulation

☐ Dimensions/capacity

☐ Materials of construction

concrete floor

☐ Secondary containment

☐ What process

plating wastes

☐ Volume/Rate

☐ From Another SWML?

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release

☐ Yes ☐ No

If Yes, Describe

Notes \* Refer to Bill Wesley's notes on all SWMLs

Signature: MP

SWMU No. 2

Name Current Haz & Nonhaz Waste Storage  
Area

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 7 of 17

Time 11:50

☒ Active/Former/Closed

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

Storage

☐ Dimensions/capacity

☐ Materials of construction

concrete floor

☐ Secondary containment

☐ What process

plating wastes, floor sweeping, plating sludge

☐ Volume/Rate

☐ From Another SWMU?

from SWMU 1

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release

☐ Yes ☐ No

If Yes, Describe

Notes: \* Refer to Bill Wesley's notes on all SWMUs

Signature: MP

SWMU No. \_\_\_\_\_

Name \_\_\_\_\_

Facility: **Certified Technology, Inc.**

City/State: **Rockford, Illinois**

Date: **6/3/98**

Page **8** of **12**

Time \_\_\_\_\_

☐ Active/Former/Closed

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

☐ Dimensions/capacity

☐ Materials of construction

☐ Secondary containment

☐ What process

☐ Volume/Rate

☐ From Another SWML?

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release

☐ Yes

☐ No

If Yes, Describe

Notes:

Signature: mp

TechLaw, Inc.

SWMU No. \_\_\_\_\_

Name \_\_\_\_\_

Facility: **Certified Technology, Inc.**

City/State: **Rockford, Illinois**

Date: **6/3/98**

Page: **9** of **17**

Time \_\_\_\_\_

☐ Active/Former/Closed

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

☐ Dimensions/capacity

☐ Materials of construction

☐ Secondary containment

☐ What process

☐ Volume/Rate

☐ From Another SWMU?

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release ☒ Yes ☐ No

If Yes, Describe \_\_\_\_\_

Notes: \_\_\_\_\_

Signature: *ml*

TechLaw, Inc.

SWMU No. \_\_\_\_\_

Name \_\_\_\_\_

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 10 of 12

Time \_\_\_\_\_

☐ Active/Farmer/Closed

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

☐ Dimensions/capacity

☐ Materials of construction

☐ Secondary containment

☐ What process

☐ Volume/Rate

☐ From Another SWMU?

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release

☐ Yes ☐ No

If Yes, Describe

Notes:

Signature: ml

### Facility Setting

- ☐ Properties/streets
- ☐ Drainage paths
- ☐ Storm sewer inlets

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 11 of 17



Notes: Refer to map provided by facility

Signature: MP

**Facility Layout/SWMU Map**

Facility: **Certified Technology, Inc.**

City/State: **Rockford, Illinois**

Date: **6/3/98**

Page **12** of **17**



Notes: Refer to map provided by facility

Signature: MP

# VSI Photograph Log

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 12 of 17

Time	Roll	Photo	Description	Direction
11:40	1	1	Former Haz Waste Sto Area / <sup>Haz Waste</sup> Current / Sat Accum.	N
			Area, also product storage	
11:45	1	2	Another view of #1, product is stored	W
			on pallets in 5-gal plastic containers	
11:51	1	3	Current Haz Waste Storage Area <sup>and Non haz</sup> <del>Haz Waste Portion</del> <sup>13 drums</sup>	S
11:52	1	4	Another view of #3, Non haz portion	SW
			↳ approx. 100 drums, ~75 N; ~25 misc.	
12:04		5	Another view of #3 & #4, primarily floor	W/SW
			sweepings (left) and primarily sludge (right)	
			↳ 1-gal containers on right = product	

Notes: Clean Harbors is current/past Haz Waste Handler, will switch to Landlaw in near future

→ facility is SQG, <180 day storage

→ plating solution evaporated, removed as non-haz sludge - (Clean Harbors, Fibertek, maybe Landlaw in near future)

Signature: *MP*

TechLaw, Inc.

## VSI Photograph Log

**Facility:** Certified Technology, Inc.

**City/State:** Rockford, Illinois

**Date:** 6/3/98

Page 14 of 17

[illegible]

## Wrap-Up Meeting

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 15 of 17

Time \_\_\_\_\_

1.) MSDSs

☒ reviewed

2.) Manifests

☐

3.) Facility Maps

☐

4.) Transporter

(Name/City/EPA I.D.) Envir.

☐

5.) Permits:

~~NPDES~~

~~Stormwater~~

~~Air~~

Only Permit

☐

POTW General Wastewater Discharge Permit

☐

Rock River Water Reclamation District

☐

Effective Feb 1, 1997 - Jan 31, 2000

☐

6 month - 12 month reporting frequency

☐

Discharge limitations - 40CFR Part 413

6.) Monitoring Data NA

☐

7.) Questions From Facility

☐

8.) CBI Request

☐

9.) Contact

☐

Facility Notes:

Will send copies of MSDSs, POTW Permit, + POTW monitoring events (facility copier is broken)

Left site at 12<sup>30</sup> PM

Signature: *MF*

TechLaw, Inc.

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 16 of 17

→ 10 ppm Ni allowed in discharge, approx. 2 ppm in actual discharge  
all other metals parameters below requirements

→ water from rinse tank (last tank of 3, 1st tank has highest concentration)

→ Ni plating bath solution is tested in lab and related wastes are disposed  
in other plating waste drums - non hax Ni drum (pH ~ 8)

END

MP

left facility ~ 12<sup>30</sup>

Notes:

Signature: *MP*

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 17 of 12

Notes:

Signature: *mf*

TechLaw, Inc.

## Introductory Meeting

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page: 1 of 1

### Personnel Present

Time 0955

#### 1.) VSI Team

Bill Wesley }  
Mike Powers } TechLaw

#### 2.) Facility Representatives

Ed Eggleston, Certified  
Ken R. Thompson, Fehr-Graham Associates  
Duane Herrmann, Certified Tech

#### 3.) State Representative

### Topics Addressed

#### 1.) Purpose of VSI

☒ PA/VSI

#### 2.) List of SWMUs/AOCs

Possible

☐ Satellite Accumulation Area (AKA, Former Haz Waste Storage Area)  
☐ Current Hazardous & Non Hazardous Storage Area  
Dumpster w/ ~~hazardous~~ domestic-type refuse

#### 3.) Health and Safety

☐ Modified Level D - no overhead hazards, no hard hat

#### 4.) Transportation on Site

☐

#### 5.) Other

☐

### Notes:

Signature: \_\_\_\_\_

TechLaw, Inc.

**Current/Former Operations**

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page 2 of 2

Time 1030

1.) Current Owner

B+J Building Corporation

Current Operator

Certified Technology

Dates of Current Operations

1984 to Present

Operations

Electroless Nickel Plating &  
car storage

2.) Former Owner

Thinks B+J built it in late

Former Operator

30's early 40's. k+something

Dates of Former Operations

made washer tanks (not sure  
however)

Operations

pre-1984

3.) Former Owner

no idea what was here prior  
to 1930's or 1940's

Former Operator

Dates of Former Operations

Operations

Various

Notes:

Machine Shops occupied north end of facility  
for last 7-8 years.

Windows & Door Shop ~ 2-3 years (prior to  
Machine shop)

Empty prior to Windows & Door

Signature: Phu

6-3-98

# Hazardous Waste Processes

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page \_\_\_\_\_ of \_\_\_\_\_

Time \_\_\_\_\_

Current/Former

Waste(s) Generated

Annual Rate 55-gallon  
Disposition

Disposition

Dates

D002 muretic acid, nitric acid, phosphoric acid  
sodium Hydroxide cleaner, stripper

8-10 nitric 2-3 muretic cleaner ~4

since 1984 stripper ~6

Current/Former

Waste(s) Generated

Rate

Disposition

Dates

(selenium)  
D008, D010, D002, D007

since 1984, although documentation  
prior to 1986 may not list the metal codes.  
Processes have not changed since 1984

Current/Former

Waste(s) Generated

Rate

Disposition

Dates

non-hazardous  
nickel plating bath (nickel sulfate & it has  
phosphorus in it); sodium ortho phosphite  
sludge w/n nickel (3-5 55gallon); most of  
the 55-gallon drums are primarily liquid  
since 1984; additional constituents

Notes:

lead, copper, cadmium, Chromium <sup>sanitary limits</sup> <sup>with</sup> some unknown stabilizers  
possibly selenium  
Allowed 10ppm of nickel in their sanitary discharge; analytical  
indicates 2ppm

Third rinse wastewater is  
what is discharged to POTW.

Signature: \_\_\_\_\_

## Hazardous Waste Processes

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page \_\_\_\_ of \_\_\_\_

Time \_\_\_\_\_

Current/Former

Waste(s) Generated

Rate

Disposition

Dates

Waste Oil (2-gallon, tin pan) from  
Car Club - <sup>existed</sup> SINCE 1997 (October)

Car Club members must take all  
wastes home with them; they are  
responsible for disposal of waste oil,  
etc.

Current/Former

Waste(s) Generated

Rate

Disposition

Dates

Current/Former

Waste(s) Generated

Rate

Disposition

Dates

Nickel plating bath samples from lab  
are drummed in non-hazardous nickel  
plating bath drum

Lab in operation since 1984

Notes:

The part of building to the north of  
the plating area has only been leased since May 1997

Rock River Water Reclamation District

Signature: \_\_\_\_\_

**Active/Closed USTs**

NA

Facility: **Certified Technology, Inc.**

City/State: **Rockford, Illinois**

Date: **6/3/98**

Page: \_\_\_\_\_ of \_\_\_\_\_

Time \_\_\_\_\_

_____ Product	_____
Capacity	_____
Construction	_____
Installed (yr)	_____
Closed/Date	_____
_____ Product	_____
Capacity	_____
Construction	_____
Installed (yr)	_____
Closed/Date	_____
_____ Product	_____
Capacity	_____
Construction	_____
Installed (yr)	_____
Closed/Date	_____

Notes: \_\_\_\_\_

Signature: \_\_\_\_\_

*BW 6-3-98*

1 of each: cleaner, stripper, phosphoric  
nitric, & muriatic

SWMU No. 1

Name Former Hazardous Waste Area /  
Current Satellite Accumulation  
Area

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page      of     

- 1997 IEPA Certified storage / currently SAA Time 1140  
closed > 90 day area
- ☐ Active/Former/Closed Cleaner + stripper - 0002, 0007, 0008, 0010
- ☐ Waste Managed/Code Muriatic/phosphoric/nitric acids - 0002, 0007, 0008, 0010
- ☐ MSDS/Analytical 5 drums
- ☐ Period of Operation SAA since 6/4/97; > 90 day since 1980's - 1996
- ☐ Type of unit 35-gallon drum storage
- ☐ Dimensions/capacity 15' x 15'
- ☐ Materials of construction concrete floor; good condition, no cracks
- ☐ Secondary containment indoors
- ☐ What process stripping
- ☐ Volume/Rate plating & ringing & cleaning of incoming parts
- ☐ From Another SWMU? (see previous pages)
- ☐ Disposition of Waste no
- ☐ Evidences of release Clean Harbors / Fibro-Tech / might start w/ Laidlaw
- ☐ Structural integrity good
- ☐ Documented Release ☐ Yes ☒ No

If Yes, Describe

Notes:

Signature:

SWMU No. 2

Name Current Hazardous Waste  
Storage Area

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page      of     

All Drums (55-gallon) are plastic

Time 11:50

☐ Active/Former/Closed

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

☐ Dimensions/capacity

☐ Materials of construction

☐ Secondary containment

☐ What process

☐ Volume/Rate

☐ From Another SWMU?

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release

(Same as SWMU 1) ? D002

200 nickel plating bath 55-gallon drum

7 drums (55-g) of sludge

05/97 to present

Drum storage

40' x 20'

concrete

indoors

Plating & rinsing & cleaning/stripping of incoming waste

13 55-gallon Haz Waste Drums; 200 non-Hazardous nickel plating bath

Yes, Haz Waste Drums from SWMU 1

Evaporate in past to get sludge; Clean Harbors Fibro-Tech or Laidlaw

no

good, no cracks

☐ Yes ☒ No

If Yes, Describe

Notes:

SO G → they can store for up to 180 days w/out permit

Currently accumulating it, to see if electro dialysis to recover nickel is feasible

Signature: Bm

6-3-98

TechLaw, Inc.

SWMU No. 3

Name Nonhazardous Nickel Plating Bath Solution

Facility: Certified Technology, Inc.

City/State: Rockford, Illinois

Date: 6/3/98

Page        of       

see previous page / consolidated with SWMU 2

☐ Active/Former/Closed

☐ Waste Managed/Code

☐ MSDS/Analytical

☐ Period of Operation

☐ Type of unit

☐ Dimensions/capacity

☐ Materials of construction

☐ Secondary containment

☐ What process

☐ Volume/Rate

☐ From Another SWMU?

☐ Disposition of Waste

☐ Evidences of release

☐ Structural integrity

☐ Documented Release ☐ Yes ☐ No

If Yes, Describe

Notes: Certified will copy NPDES Sanitary Sewer District permit & compliance report documents as well as an MSDS permit

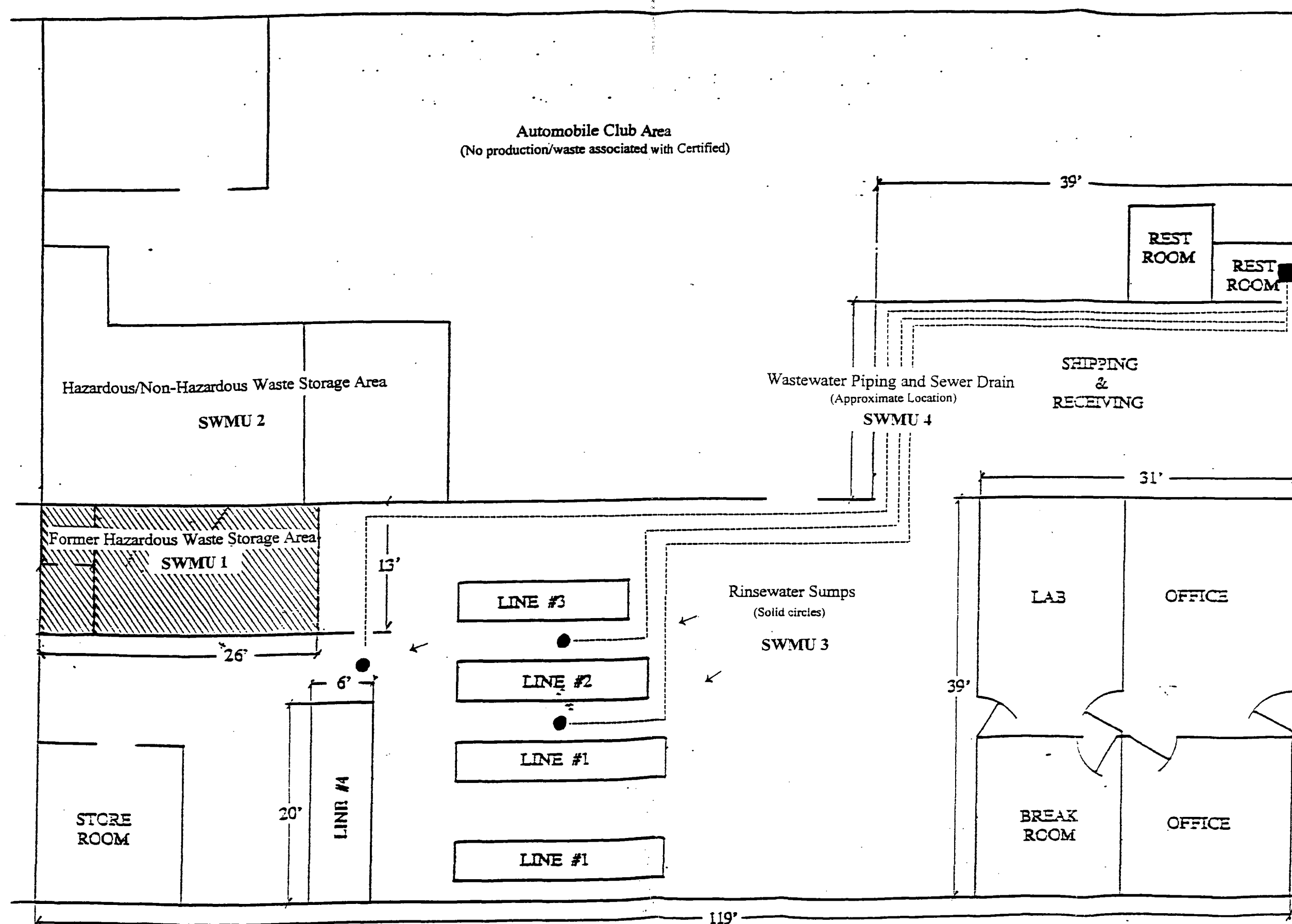
Signature:

**APPENDIX C**  
**FACILITY LAYOUT AND SWMU/AOC LOCATIONS**

# Facility Layout and SWMU/AOC Locations

Section B

Section A



RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

CERTIFIED TECHNOLOGY, INC.

EPA SITE NUMBER: ILR000016980

ROCKFORD, IL

SCORED BY: M. POWERS

OF TECHLAW, INC.

ON 07/15/98

GROUNDWATER SCORE : 8.12

SURFACE WATER SCORE: 14.10

AIR ROUTE SCORE : 0.00

ONSITE SCORE : 0.00

-----

MIGRATION SCORE : 8.14

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? N

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 225

NET PRECIPITATION (IN.) : 2

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.3

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? N

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 2.5

DISTANCE TO SURFACE WATER (MILES): 0.06

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.3

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 2.0

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? N

CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 2.0

EPA ID NO. : ILR000016980  
CERTIFIED TECHNOLOGY, INC.

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: INACCESSIBLE

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.02

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N